

EXHIBIT "D"

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ESTES EXPRESS LINES
3901 West Broad Street
Richmond, Virginia 23230

Plaintiff

v.

NEW CASTLE TRUCK REPAIR AND
MANUFACTURING, INC.
1009 River Road
New Castle, Delaware 19720

Defendant

CIVIL ACTION


NO. 1:05-cv-00670-KAJ

**AFFIDAVIT OF
DAVID S. JONES**

I, David S. Jones, do hereby declare under penalty of perjury that the below information is true and correct to the best of my knowledge:

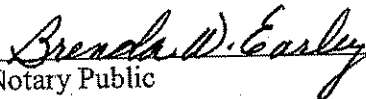
1. I am employed by Estes Express Lines ("Estes"), and as such am authorized to sign this Affidavit on behalf of Estes.
2. I have read the Complaint filed in this action, along with the attached exhibit, and know the contents thereof to be true.
3. This matter arises as a result of an agreement entered into between New Castle Truck Repair and Manufacturing, Inc. ("New Castle") and Estes for the movement of freight by motor carrier.
4. During the time period of August 2004 through February 2005, Estes moved freight for New Castle and presented New Castle with freight bills for each movement, totaling \$34,402.68, plus accrued interest. See Invoices attached as Exhibit "A" to the Complaint.
5. Since the filing of the Complaint, no payments have been made by New Castle to Estes.

6 New Castle remains indebted to Estes in the amount of Thirty-Four Thousand Four Hundred Two Dollars and Sixty-Eight cents (\$34,402.68), plus accrued interest.



David S. Jones
Estes Express Lines

Sworn and subscribed before me this 14th day of March 2006



Notary Public

My Commission Expires February 28, 2007